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**By electronic filing**

The Honorable Elizabeth D. Laporte  
Northern District of California  
450 Golden Gate Ave., 15th Floor  
San Francisco, CA 94102

**Re: *Bhatnagar v. Ingrassia et al.*, Case No. 3:07-cv-02669 (CEB)(EDL)**

Dear Magistrate Judge Laporte:

On Tuesday, August 26, 2008, Plaintiff Abhinav Bhatnagar and Defendant Jason Ingrassia appeared before you on Plaintiff's motion to compel discovery. At the close of that hearing, you requested that Plaintiff's counsel draft a proposed order, meet and confer with opposing counsel, and jointly file a proposed order by the end of this week.

Due to the numerous issues ruled upon by the court, Plaintiff's counsel requested and received an expedited transcript of the hearing. Nevertheless, the parties in this case have been engaged in lengthy depositions every day this week since the hearing date. Despite the best efforts by both parties, we are unable to jointly file a proposed order today as the court requested.

The parties are actively conferring on a draft order and expect to jointly file the proposed order on Tuesday, September 2<sup>nd</sup>, after the holiday weekend. The court's time and consideration of this matter is sincerely appreciated, thank you!

Yours truly,

/s/ Jenny Huang

Jenny Huang

cc: Noah Blechman, Esq.  
Gregory Harvey, Esq.